

UNITED STATES DISTRICT COURT

for the

US District of Oregon

Portland Division

Case No. _____

(to be filled in by the Clerk's Office)

Leanne J. Hensley

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

Nike

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

Jury Trial: (check one) ☒ Yes ☐ No

COMPLAINT FOR EMPLOYMENT DISCRIMINATION

I. The Parties to This Complaint**A. The Plaintiff(s)**

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

| | |
|--------------------|--------------------------|
| Name | Leanne J. Hensley |
| Street Address | PO Box 6166 |
| City and County | Bend, Deschutes |
| State and Zip Code | Oregon, 97708 |
| Telephone Number | 503 741 1616 |
| E-mail Address | leannejhensley@gmail.com |

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

Defendant No. 1

| | |
|----------------------------------|--|
| Name | Jorge Casimiro / Leah Brecunier ~ Assistant |
| Job or Title <i>(if known)</i> | Chief Social & Community Impact Off., Nike PRESID. / NIKE |
| Street Address | One Bowerman Drive |
| City and County | Beaverton, Washington |
| State and Zip Code | Oregon, 97005 |
| Telephone Number | 503-671-6453 / (Office: 503-671-3541) / (Office: 503-866-8155) |
| E-mail Address <i>(if known)</i> | jorge.casimiro@nike.com |

Defendant No. 2

| | |
|----------------------------------|---|
| Name | Noel Kinder / Kris Merician ~ Assistant |
| Job or Title <i>(if known)</i> | Chief Sustainability Officer, NIKE |
| Street Address | One Bowerman Drive |
| City and County | Beaverton, Washington |
| State and Zip Code | Oregon, 97005 |
| Telephone Number | 503-671-6453 |
| E-mail Address <i>(if known)</i> | noel.kinder@nike.com |

Defendant No. 3

| | |
|----------------------------------|---|
| Name | Jenn Longbine |
| Job or Title <i>(if known)</i> | Global Director Talent Acquisition, Nike Direct |
| Street Address | One Bowerman Drive |
| City and County | Beaverton, Washington |
| State and Zip Code | Oregon, 97005 |
| Telephone Number | 503-671-6453 / Direct: 310-913-7722 |
| E-mail Address <i>(if known)</i> | jenn.longbine@nike.com / |

Defendant No. 4

| | |
|----------------------------------|--|
| Name | Alex Maier / ****See Attached FULL List of Nike Contacts |
| Job or Title <i>(if known)</i> | Global Marketing Director of NIKE Swim Division |
| Street Address | One Bowerman Drive |
| City and County | Beaverton, Washington |
| State and Zip Code | Oregon, 97005 |
| Telephone Number | 503-671-6453 |
| E-mail Address <i>(if known)</i> | alex.maier@nike.com |

C. Place of Employment

The address at which I sought employment or was employed by the defendant(s) is

| | |
|--------------------|-------------------------|
| Name | Nike World Headquarters |
| Street Address | One Bowerman Drive |
| City and County | Beaverton, Washington |
| State and Zip Code | Oregon, 97005 |
| Telephone Number | 503-671-6453 |

II. Basis for Jurisdiction

This action is brought for discrimination in employment pursuant to *(check all that apply)*:

☒ Title VII of the Civil Rights Act of 1964, as codified, 42 U.S.C. §§ 2000e to 2000e-17 (race, color, gender, religion, national origin).

(Note: In order to bring suit in federal district court under Title VII, you must first obtain a Notice of Right to Sue letter from the Equal Employment Opportunity Commission.)

☒ Age Discrimination in Employment Act of 1967, as codified, 29 U.S.C. §§ 621 to 634.

(Note: In order to bring suit in federal district court under the Age Discrimination in Employment Act, you must first file a charge with the Equal Employment Opportunity Commission.)

☒ Americans with Disabilities Act of 1990, as codified, 42 U.S.C. §§ 12112 to 12117.

(Note: In order to bring suit in federal district court under the Americans with Disabilities Act, you must first obtain a Notice of Right to Sue letter from the Equal Employment Opportunity Commission.)

☒ Other federal law *(specify the federal law)*:

Genetic Information Nondiscrimination Act (GINA) / 1st & 8th Amendment

☒ Relevant state law *(specify, if known)*:

- 42 U.S.C. as Codified, 1983/1985/1986/1988 1983/1985/1986/1988 / ORS 659.800 & ORS 659.805 / Oregon SB577

☐ Relevant city or county law *(specify, if known)*:

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

A. The discriminatory conduct of which I complain in this action includes *(check all that apply)*:

- ☒ Failure to hire me.
- ☐ Termination of my employment.
- ☐ Failure to promote me.
- ☒ Failure to accommodate my disability.
- ☒ Unequal terms and conditions of my employment.
- ☒ Retaliation.

Other acts (*specify*):

Contributor to AEC Blacklisting through Funding; Acts of Intimidation, Slander, contributor to a Swatting Crime with ZGF Architects / Oregon DOJ / Gov. Kate Brown, through Negligence to Hire a highly Qualified Licensed Design Professional, Business Owner & over 15+ yr Athlete/Credential Coach x (3) Capacities.

Contributor to Funding State Universities which support ONLY Architectural Licensure Regulations, but at the same time promote Interior Architecture / Interior Design Collegic Academic Programs, which devalue & contradict my path to Corporate Professionalism within the AEC / A&D portion of my Credentials/Experience, wherein my otherwise High Market Value (in many other Areas of the Globe & United States) - is thus, DE-VALUED. **WILLFUL engagement & promotion of Neuro-Discrimination, for years within the Oregon Corporate Market.

***Oregon has NO Commercial Interiors Professional Licensure Regulation Standards, but MANY other States do, namely Virginia, Florida and Colorado - to start...

***Nike's strong Financial support of numerous State Funded & Private Higher Education Facilities such as those at: Oregon State University, Portland State University, University of Oregon, Univestity of Portland, Oregon Institute of Technology, Lewis & Clark College, Linfield College of Portland, Reed College, Oregon Health & Science Univesrity, Willamette University, Central Oregon Community College, Pacific NW College of Art, Clatsop Community College, Clackamas Community College, Amercian College of Healthcare Sciences, Lane Community College, Mt. Hood Community College and MORE, for a Total of nearly (80) Academic Institutions + even MORE Oregon-wide Business / Community Partners ~ wherein their own LACK OF Ethnic/Gender Diversity is actually severe Structured Racism in the form of connected Propaganda regarding "Oregon" and "PNW" Culture, within the entire Society and Corporate Market. ***Oregon has a long hidden past in Racism and it continues STRONG today, related to KKK Activity, which has been "re-branded" SEVERAL times over...

(Note: Only those grounds raised in the charge filed with the Equal Employment Opportunity Commission can be considered by the federal district court under the federal employment discrimination statutes.)

B. It is my best recollection that the alleged discriminatory acts occurred on date(s)

In April 2019 - I sought to be Hired for the Position of: Senior Director of Advocacy & Global Sustainability / SENIOR DIRECTOR OF SUSTAINABILITY ENGAGEMENT, FUTURE OF SPORT, position ~ since I had been admitted to the HPDS's Supply Chain TS_Group, and formerly held numerous Leadership / Educator / AEC & Business positions, as well as being a Credentialed Athletic Coach for (3) capacities ~ along with being a Virginia State Licensed Professional & Oregon Certified WBE/MBE Business Owner, who is closely associated with Nike's #closest AEC Firm: ZGF Architects.

***I was instead Swatted during a series of ILLEGAL Actions from MANY State Officials, Oregon DOJ Officials, Intelligence Officials and Nike Personel ~ in conjunction with corrupt Police from Astoria & Bend; (2) Lawyers & the Bend DA, John Hummel and the Oregon DOJ - to include (2) USAF Personel - during an Active C.I.A. #NOFEARACT Investigation into years of Blacklisting from the Oregon AIA, as a whole - in which I now have the Right to Sue, BOTH Nike & ZGF Architects for.

***I have been terrorized in severe and horrific, Acts of White Nationalism; Racial & Neuro-Hate; and literal Acts of Domestic Terrorism, Intimidation and gang-style Bullying from Nike's Employees / Vendors ~ for a year straight, due to Nike's propensity to push both White & Black Supremacy through extensive Culturally Racist & Appropriating Marketing; Hiring Practices and an aggressive, #toxic Caucasian and African American Male & Female dominated Culture, wherein specific demographics of Employee or Societal Rights are also specifically pushed for: Latina/o's; Chinese and LGBTQ persons ~ which further reinforces Nike's White Nationalist & Orientalism-based Racist strategies, which seek to "demonize" or erase - those Asians deemed a "threat".

***Oregon does NOT have State Commercial Interiors Licensure. I was Swatted to be kept quiet from Reporting the Blacklisting; pursuing a Tort Claim against the City of Astoria AND to prevent me from joining Nike, since the State & my Oregon AIA Colleagues have made it abundantly clear that I am: INCOMPETENT & IDIGENT, as per FALSE Reports created by the State of Oregon / Oregon DOJ - in order to discredit, shame and intimidate me into submission, during many Acts of Itimidation and Domestic Terrorism that are culturally & Politcally inter-connected ~ as well as immoral.

C. I believe that defendant(s) *(check one)*:

- ☒ is/are still committing these acts against me.
☐ is/are not still committing these acts against me.

D. Defendant(s) discriminated against me based on my *(check all that apply and explain)*:

- | | | |
|-------------------------------------|--|--|
| <input checked="" type="checkbox"/> | race | Guyanese Asian Indian |
| <input checked="" type="checkbox"/> | color | Brown |
| <input checked="" type="checkbox"/> | gender/sex | Female |
| <input checked="" type="checkbox"/> | religion | Christian / Ashtanga & Iyengar based Yoga Practitioner |
| <input checked="" type="checkbox"/> | national origin | East Indian / South Asian / Indian American / Desi-American |
| <input checked="" type="checkbox"/> | age <i>(year of birth)</i> | 1983 <i>(only when asserting a claim of age discrimination.)</i> |
| <input checked="" type="checkbox"/> | disability or perceived disability <i>(specify disability)</i> | |

Pro Se 7 (Rev. 12/16) Complaint for Employment Discrimination

Slandered in a Swatting Crime and broadcast to the
entire PNW / National / Global AEC Industry ~ that
I'm #incompetent & #indigent.*****WILLFUL
engagement & promotion of Neuro-Discrimination,
for years within the Oregon Corporate Market.

E. The facts of my case are as follows. Attach additional pages if needed.

On May 12, 2020 ~ As discussed at length with the Seattle Supervisor Eric on the Phone/Email & via email to Investigator Byrne ~ the severe Oregon/PNW/USA - AEC Retaliation from Nike, AIA Members and Oregon State Agencies ~ as since Reported to the OGEC, via Investigator Ron via the Complaint Portal & email - yesterday 5.12.2020 in detail.

***Sadly, the overt & Unprofessional Retaliation I have continued to experience for Pursing the Right to Sue several Companies/Agencies of Authority - has long since progressed into gang-stalking from the Bend Police....The DPSST has also been given very detailed information on 5.6.2020 ~ on the horrific Human & Civil Rights Violations from (2) Law Enforcement Departments/Counties and will be mailed additional evidence, to assist them. ~ I have had to flesh out the details of such high-level Criminality from those in the Oregon AIA & within the overall AEC Market ~ directly to Inspector General Horowitz, several other Legislators and of course, Oregon Senator Wyden ~ have now been fully informed of the details behind the actions of those responsible...

- Congressman Ro Khanna / Washington State Democratic Senate Staffer & President of SABA, Samir Junejo recognized that I've endured a Swatting Crime - in response to Reporting a Hate Crime / years of Employment Blacklisting from the Oregon AIA, through support of Nike's thirst for #innovation, - at the time I was issued the Right to Sue from the Seattle EEOC.

- On May 8th, 2020 ~ I informed the Oregon Architects Examiner Board Investigator, Gary ~ via phone & email about connected Official Complaints, Investigation details & Filed a Formal Complaint under Governor Kate Brown, via the Oregon Government Ethics Complaint Portal Online on May 12, 2020. I followed up with the FULL extents of my digital Case Files for the (3) Case I have Registered to Represent. ***He and I had actually talked a few months back and he agreed then ~ that what I had been experiencing for YEARS was Illegal....

- AIA Virginia and AIA Hampton Roads - support my Right to work in Oregon WITHOUT Discrimination due to my State of Virginia License & Asian Indian Race.

~ (6) State & Federal Investigators are involved at this point as of May 14th, 2020.

I was Swatted during an Active #CIA, NOFEARACT Investigation INTO THE BLACKLISTING beginning April 2019, after a staged Arrest in February 2019, after Launching a Tort Claim in December 2018 for a Reported Hate Crime from the City of Astoria Police Department / City Council, in June 2018 - which many Legislators & IG's know about in detail...after which I was leading National Political AEC Advocacy...and pursuing a Sr. Nike position, because they were the only appropriate Employer to approach, due to my extensive Credentials - which are solidly well-established creative, innovative & neuro-diverse.I've lived in Oregon for (5) years....these things should have NEVER happened.

~ SABA National & the Oregon State Bar are #gatekeeping...I've already Reported via Complaint the (2) Attorneys & Bend DA involved in the Swatting Crime to the Oregon State Bar / issued Testimony to Congressman Buck, Rep Ben Cline & Rep Cohenon ~ March 13th, 2020 for H.R. 5602, Domestic Terrorism Prevention Act of 2020 ~ since I was Swatted for trying to Report Unlawful Blacklisting - due to my State of Virginia Licensure and Asian Indian Race.

~ I've also been able to detail the FULL extents of the Intelligence Community's mis-use of my Indian Culture, Asian Heritage/Guyanese Race, Credentials/Personal Life, related to protecting Nike ~ within actions of National Politics, Media occurrences, Financial Tariffs, and Nike Athlete collusion for severe Civil Rights Violations.

~ As of last week specifically, I documented extreme White Nationalism from Nike & Oregon AIA ~ all of which continues to be Unlawfully protected by ALL Legal Professionals in the State of Oregon - due to protecting their Nike & Architect Colleagues ~ by refusing to give Legal Representation...

***Please Reference the Complaints given the State of Oregon Courts for:

1) Civil Case Complaint for Nike /// 2) Employment Discrimination from ZGF Architects & Civil Case Complaint for ZGF Architects /// 3) Complaint Filed for Civil Rights Violations for the State of Oregon & the Oregon DOJ /// 4) Official Complaints Filed for State & Federal Agencies

***Please have the Judge, Review the digital Guide Documents to the entire L.Hensley Set of (3) Cases within Oregon Courts, regarding: a)Hate Crime, b)Blacklisting per Right to Sue x (2), and c) a Swatting Crime - separated out via Word Doc, each referenceing Dropbox links, containing Files of complete Importance, for such continued: sensitive, immoral & Unlawful Discrimination. ***These links have been already shared with 4+ Investigators, both State & Federal. ***For these reasons, & as per CIA Case#P2019-00581 / CIA-IG Case #H20191964 / OGIS Case No. 19-03045 ~ I kindly ask the Oregon Courts to SEAL these Court Filings & all Records sent for State or Federal Review of Unlawful Violations of Civil & Human Rights

(Note: As additional support for the facts of your claim, you may attach to this complaint a copy of your charge filed with the Equal Employment Opportunity Commission, or the charge filed with the relevant state or city human rights division.)

IV. Exhaustion of Federal Administrative Remedies

- A. It is my best recollection that I filed a charge with the Equal Employment Opportunity Commission or my Equal Employment Opportunity counselor regarding the defendant's alleged discriminatory conduct on *(date)*

Yes ~ I have endured 2+ years of Illegality from Nike's direct & indirect Influence on Oregon's Market.

- B. The Equal Employment Opportunity Commission *(check one)*:

☐

has not issued a Notice of Right to Sue letter.

☒

issued a Notice of Right to Sue letter, which I received on *(date)* 2/13/2020.

(Note: Attach a copy of the Notice of Right to Sue letter from the Equal Employment Opportunity Commission to this complaint.)

- C. Only litigants alleging age discrimination must answer this question.

Since filing my charge of age discrimination with the Equal Employment Opportunity Commission regarding the defendant's alleged discriminatory conduct *(check one)*:

☒

60 days or more have elapsed.

☐

less than 60 days have elapsed.

V. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

~ I am worth \$250,000 Annually as an over 15+ year Commercially-based, State Licensed Professional & Educator, who is now an Oregon Certified WBE/MBE Business Owner and multi-Credentialed Athletic/Wellness Coach.

~ I kindly Request the State of Oregon Court to Order that Nike World Headquarters to pay Restitutory Compensation Damages of: (1) year for Unlawful Employment Discrimination + (2) years for Contribution to AEC Blacklisting in Oregon / PNW + (1) year for being apart of a Swatting Crime to protect the PNW-wide AEC Blacklisting + (1) year of Medical Damages of permanent damage done to Victim's Athletic body from Nike's direct involvement in the Swating Crime with the Oregon DOJ / State of Oregon and beyond...

*** (4) years of Damages valued at: a minimum of \$1 Million Dollars, plus Attorney's & Court Fees & State Taxes / ***PLUS ~ Ethics Violations Fines via open Violation of - 42 U.S.C as Codified, 1983/1985/1986/1988 / ORS 659.800 & ORS 659.805 / Oregon SB577 ~ valued at 75% of (4) years Value, for another \$750,000 in Compensation for Victim / ***PLUS Medical Damages valued at \$1 Million Dollars.

~ TOTAL MINIMUM Compensation Valued at: \$3.5 Million + Additional Fees listed above.

I ALSO kindly Request that the State of Oregon, via guidance from Nike, ZGF Architects and the Oregon AIA - to introduce NEW Commercial Interiors State Licensure. I'd like to be the 1st Oregon State Certified Interiors Professional.

VI. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 5/14/2020

Signature of Plaintiff Leanne J. Hensley

Printed Name of Plaintiff Leanne J.Hensley

B. For Attorneys

Date of signing: 5/14/2020

Pro Se 7 (Rev. 12/16) Complaint for Employment Discrimination

| | |
|--------------------------|--------------------------|
| Signature of Attorney | n/a |
| Printed Name of Attorney | n/a |
| Bar Number | n/a |
| Name of Law Firm | n/a |
| Street Address | PO Box 6166 |
| State and Zip Code | Bend, Oregon 97708 |
| Telephone Number | 503 741 1616 |
| E-mail Address | leannejhensley@gmail.com |